

6962 '99 MAY -7 PI2:39

Dockets Management Branch (HFA-305) Food and Drug Administration 5630 Fishers Lane, Room 1061 Rockville, MD 20852.

RE: Docket #98N-1038, "Irradiation in the production, processing and handling of food."

To whom it may concern:

The Sonoma Ecology Center works in the Sonoma Valley area of California, with hundreds of members in an area renowned for its agriculture and viticulture. We are proud of our agricultural heritage and well aware of the power of labels to either encourage or dissuade public trust in our agricultural products.

The idea of food irradiation is intriguing as a means of retarding spoilage and prolonging shelf life; on the other hand, mislabeling products is ultimately a costly enterprise. Consumer mistrust of a product can cost far more than gains from a cost-saving technique such as added shelf life. We have plenty of experience to prove this assertion.

From this vantage, a revision of product labeling for irradiated foods is troubling. Claiming a food to be cold-pasteurized, or electronically-pasteurized is ultimately mislabeling. Likewise, having no label implies that a product is not treated, which is also misleading. It is also unfair to producers who chose a different method. Choice is an important aspect of agriculture and its improvement. Meanwhile, while the public may fear irradiation, experience indicates that they are more likely to react to false labeling with long-term mistrust, an unhealthy situation for growers, consumers, retailers and government.

For all these reasons, we strongly encourage labeling irradiated products as they are: "irradiated". We feel for the same reasons that no expiration date should be attached to such labeling.

Sincerely,

Richard Dale Executive Director

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